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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

STEEP HILL LABORATORIES, INC., and  
JMICHAELE KELLER,

Plaintiffs,

v. '

DAVID H. MOORE, an individual, and DOES  
1 through 10, inclusive,

Defendants.

Case No. 3:18-cv-00373-LB

**JOINT STIPULATION AND  
[PROPOSED] ORDER REGARDING  
PARTICIPATION IN EXTENDED  
TELEPHONIC CASE MANAGEMENT  
CONFERENCE**

Trial Date: None set.

Date Action Filed: December 20, 2017

AND RELATED COUNTERCLAIM.

Plaintiffs Steep Hill Laboratories, Inc. and JMichaele Keller (collectively, "Plaintiffs") and  
Defendant David H. Moore ("Defendant") (collectively, the "Parties"), through their undersigned  
counsel, hereby stipulate as follows:

WHEREAS, via the Court's comments at the March 14, 2019 Case Management  
Conference in this matter, as memorialized in part in the Court's March 15, 2019 Order, United  
States District Judge Laurel Beeler offered to conduct an extended telephonic Case Management  
Conference with the Parties to attempt to advance settlement potential, in the event the Parties

1 believed such effort would be helpful and were not otherwise able to make headway on their own;

2 WHEREAS, the Parties have met and conferred about settlement following the March 14  
3 Case Management Conference;

4 WHEREAS, from September 14, 2018 to present, Defendant has not changed his position  
5 on settlement;

6 WHEREAS the Parties would like to accept the Court's offer to conduct an interim  
7 extended telephonic Case Management Conference to try to assist the Parties in reaching a  
8 resolution .

9 THEREFORE, the Parties hereby respectfully request that the Court calendar such  
10 extended conference to occur as is feasible with the Court's calendar. Counsel for Plaintiffs is  
11 not, however, available April 5 through 15, 2019 inclusive.

12 **IT IS SO STIPULATED.**

13  
14 Dated: March 29, 2019

VEDDER PRICE (CA), LLP

15  
16 By: /s/Heather M. Sager  
Heather M. Sager

17 Attorney for Plaintiffs  
18 STEEP HILL LABORATORIES, INC. and  
19 JMICHAELE KELLER

20  
21 Dated: March 29, 2019

DAVID H. MOORE

22  
23  
24 By: /s/David H. Moore  
Defendant David H. Moore

**PROPOSED ORDER**

Having read and considered the Parties' Stipulation and Proposed Order Regarding Extended Case Management Conference and good cause appearing, it is hereby ordered that this matter be calendared for a Case Management Conference not to exceed one hour, at which all parties may appear telephonically, to be held at \_\_\_\_\_ a.m./p.m. in Department \_\_\_\_\_. Parties to make arrangements for attendance via Court Call no later than \_\_\_\_\_ days in advance of the conference.

Dated: \_\_\_\_\_, 2019

By: \_\_\_\_\_  
Magistrate Judge Laurel Beeler